

September 2, 2013
COR-13-061
Certified Mail #7011 1570 0001 1559 1673

Director, Air and Waste Management Division
United States Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

SUBJECT: Sumitomo Metal Mining Pogo LLC (Pogo) Revised Initial CISWI Performance Test Incinerator Parameters / Operating Limits Petition; Revised Unit 412 CISWI Test Plan September 2013; and Unit 412 Incinerator Test Report June 2013.

Dear Sir or Madame:

As promised during the meeting with US EPA on August 22, 2013, Sumitomo Metal Mining Pogo LLC (Pogo) is submitting the following three documents:

1. Revised Initial CISWI Performance Test Incinerator Parameters / Operating Limits Petition (Petition);
2. Revised Unit 412 CISWI Test Plan September 2013 (September Test Plan);
and
3. Unit 412 Incinerator Test Report June 2013 (June Test Report);

Petition

To expedite review of the Petition, the following is a summary of changes to the August 6, 2013 version of the Petition to address comments received from EPA.

Section (a) was revised to add "waste composition" as an additional (i.e., seventh) operating limit. The proposed operating limit sets a daily weight-percent range for each of the three waste components: MSW, sludge and rags/wipes from maintenance activities. The ranges were determined using actual incinerator records from the period of May 2, 2012 through August 15, 2013 (the data include a

total of 360 operating days). The annual average composition of each component by weight is: 78% MSW, 10% sludge, and 12% rags/wipes.

Pogo proposes to set operating ranges of: (1) ± 8 percent of the annual average weight composition for MSW and (2) ± 3 percent of the annual waste composition for sludge and rags/wipes. Because of the variability of the waste composition (due to waste-type availability, weather conditions, mine activity, etc.), it is necessary to establish a daily operating limit based on a rolling 365-day average for this parameter. This approach is justified because:

- The September 2013 performance test will be conducted with the incinerator burning a waste composition that closely approximates the annual average values,
- On an annual basis, the waste composition burned will closely match the tested composition,
- The rolling 365-day average is consistent with the CISWI rule's requirement to demonstrate compliance on an annual basis, and
- Pogo is proposing six additional operating limits as indicators of proper incinerator performance, of which three are absolute limits without any averaging periods, and three incorporate 1-hour or 3-hour averaging periods (see Table 1).

A Table 1 was added to section (a) that provides a summary of the proposed operating limits. As requested, Table 1 uses minimum and maximum parameter values for all operating parameters except waste composition which uses the ranges described above. Table 1 also incorporates the requested 5-minute and one-hour averages for primary and secondary combustion chamber temperatures. Table 1 also addresses EPA's comments regarding waste load interval and waste load weight limit.

Section (b) was revised to include a new second paragraph describing the components of the incinerated waste and the annual average waste composition. Also, a reference to the September 2013 performance test was added to the final paragraph of this section.

Section (c) was revised to add a bullet discussion of the establishment of upper and lower limits for the waste composition limit.

In Section (d) Table 1, Operating Limits Monitoring Plan Matrix was renamed "Table 2." The table was revised to include the waste composition operating range and associated monitoring information, as well as to update the incorporation of the Data Acquisition System (DAS) for continuous monitoring of the other proposed operating parameters (primary/secondary combustion chamber temperature and burn time, waste charge-rate limit and charge interval time). The text of the section was revised to include a discussion identifying the methods to be used for monitoring waste composition and to incorporate discussions of the DAS to be used to monitor the other six operating parameters. It should be noted that Pogo has not yet installed the DAS. During the performance test, these operating parameters will be manually recorded. Pogo anticipates installing the DAS in the 4th Quarter 2013.

Test Plan

To expedite review of the September Test Plan, the following is a summary of the revisions made to the June Test Plan to address comments received from EPA and ADEC.

Section 2.3 - Field Measurements, discusses the sample volumes collected during the June 2013 tests. Based on the results from the June 2013 tests, Pogo believes that adequate sample volumes can be collected during the test.

Section 2.3 - Field Measurements, describes the sample run times for the various parameters: a minimum run time of one hour for combined PM/HCl; a minimum run time of two hours from metals (Cd, Pb and Hg); and a minimum run time of two hours for D/F. Three sample runs of each sample type described above will be collected during the three-day testing period.

Section 2.4 - Audit Sample, describes the audit samples that will be included. As noted, audit samples are not available for dioxins/furans.

Table 2.1 has been revised to include visible emissions. Section 4.6 describes how visible emissions will be measured using reference method 22.

During all tests runs the waste composition will be consistent with the operating limit described in Pogo's Petition.

The revised Test Plan does not discuss the collection of fuel usage numbers. While the propane fuel has a gauge, the gauge cannot be used to accurately measure fuel usage during the test. Prior to the annual performance tests, Pogo anticipates purchasing and installing a flow meter to accurately measure fuel usage.

Section 2.5, Final Test Report, describes the contents of the Final Test Report and the timing for submittal to ADEC and EPA. Pogo will electronically report the test results to EPA.

As further discussed in the Test Plan, Pogo has scheduled the initial performance testing on October 2 through October 4. Pogo requests that EPA approve the revised Petition and revised Test Plan. Pogo appreciates EPA's time and resources in reviewing these documents.

If you have any questions, please give me a call at 907-895-2879 or email me at Sally.McLeod@smmpogo.com.

Sincerely,



Sally S. McLeod, CEM, REM
Environmental Manager

Cc: Heather Valdez, EPA
Zach Hedgpeth, EPA
John Pavitt, EPA
Robin Wagner, ADEC
Mike Short, SES
John Rosburg, AECOM
Jeff Hunter, Perkins Coie

Attachment: Pogo Mine Initial CISWI Performance Test Incinerator Parameters /
Operating Limits Petition
Pogo incinerator logs, May 2, 2012 - August 15, 2013
Revised Unit 412 CISWI Test Plan September 2013
Unit 412 Incinerator Test Report June 2013